

Our Ref:

Your Ref:

7 March 2025

Spatial Planning and Design
LB Richmond upon Thames
Civic Centre
44 York Street
Twickenham
TW1 3BZ

Sent via email: localplan@richmond.gov.uk

Dear Spatial Planning Team

Consultation on Proposed Main Modifications to the Local Plan

We write on behalf of St George Plc to provide representations to the proposed Main Modifications to the draft London Borough of Richmond upon Thames Local Plan.

Site Allocation 31 – Kew Retail Park

We support MM27 and MM28.

Policy 4 – Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency

We note that a modification to revise the carbon offset cost of £300/t) has not been proposed. As per our Hearing Statement to Main Matter 13 we consider this necessary for the plan to be sound as the £300 figure is not adequately justified.

Policy 10 – New Housing

We support MM48.

Policy 11 – Affordable Housing

We support MM49.

Policy 45 – Tall and Mid Rise Building Zones

MM72, 73, 74, and 75 are noted. Nonetheless in our view the modified policy (including supporting text and the tall building maps at Appendix 3) remains unjustifiably restrictive as per the reasons set out in our Hearing Statement to Main Matter 18.



We trust that these comments are helpful. Please contact Nick Alston ([REDACTED] / [REDACTED]) with any queries.

Yours sincerely



For and on behalf of Avison Young (UK) Limited